

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

In re:)	
)	
INTERSTATE UNDERGROUND WAREHOUSE)	
AND INDUSTRIAL PARK, INC.)	Case. No. 21-40834
)	Chapter 11
Debtor.)	

**DEBTOR'S RESPONSE IN OPPOSITION TO WAYNE REEDER'S
MOTION FOR RELIEF FROM STAY**

COMES NOW Debtor Interstate Underground Warehouse and Industrial Park, Inc. ("Debtor"), by and through his attorneys of record, and responds in opposition to Wayne Reeder's ("Reeder") Motion for Relief from the Automatic Stay (Doc. #228), states as follows:

1. Debtor admits the allegations in paragraph 1 and 2 of the Motion.
2. Debtor denies the allegations in paragraph 3 and 4 of the Motion.
3. Debtor denies the recitation of the nature of his state court lawsuit and otherwise denies all other allegations in paragraph 5 of the Motion.
4. Debtor admits the allegations contained in paragraph 6, 7,8 and 9 of the Motion.
5. Debtor states that paragraphs 10, 11 and 12 of the Motion appear to assert legal arguments, however, these recitation of case law and arguments do not support this Motion. The allegations in paragraphs 10, 11 and 12 are denied.
6. Debtor denies the allegations in paragraph 13 of the Motion. The state court docket that is attached to the Motion as an exhibit confirms that the state court action is in its infancy as Reeder filed a Motion for Leave to File an amended petition, which was not ruled on by the state court as the bankruptcy was filed, staying the state court proceeding.
7. Debtor denies the allegations contained in paragraphs 14, 15 and 16 of the Motion.
8. Debtor admits the allegations contained in paragraph 17 of the Motion.

9. Debtor denies the allegations contained in paragraph 18 of the Motion.
10. Debtor admits, as of the 2004 examination, the allegations in paragraph 19 are accurate; however, the Debtor denies that the allegations in paragraph 19 are accurate at this time.
11. Debtor denies the allegations in paragraphs 20, 21, 22, 23, 24, 25 and 26 of the Motion.
12. Debtor denies the allegations in paragraph 27 and 28 of the Motion as these paragraphs appear to make legal arguments. Case citations do not support Reeder's Motion for Relief from Stay.
13. Debtor denies the allegations contained in paragraphs 29 and 30 of the Motion.
14. Debtor acknowledges in paragraph 30 of the Motion that Reeder is willing to limit the relief, if granted, but denies that any relief from stay as to the pending state court case should be granted.

WHEREFORE Debtor respectfully requests this Court to deny Reeder's Motion and for such further relief the Court finds just and equitable.

Respectfully Submitted,

KRIGEL & KRIGEL, P.C.

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ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

On November 30, 2021, this document was served electronically by the Court's CM/ECF electronic notification system on those parties designated to receive such notification, including counsel for Wayne Reeder.

/s/ Erlene W. Krigel
Erlene W. Krigel